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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DRAKE COLLIER,

Plaintiff,

vs.

EXPERIAN INFORMATION SOLUTIONS,
INC. and TRANS UNION, LLC,

Defendants.

Case No. 2:17-cv-01486-APG-PAL

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

[First Request]

Pursuant to LR 6-1 and LR 26-4, Plaintiff, Experian Information Solutions, Inc. (“Experian”), and Trans Union LLC (“Trans Union”), by and through their respective counsel of record, hereby stipulate and request that this Court extend the motion to amend deadline by fifty (50) days. At this time, the parties are not seeking an extension of any other discovery deadlines but reserve the right to request in the future. In support of this Stipulation and Request, the parties state as follows:

I. DISCOVERY COMPLETED TO DATE

1. Plaintiff filed the instant complaint on May 25, 2017.
2. On June 21, 2017, Experian filed its answer.
3. On June 29, 2017, Plaintiff and Experian held the Rule 26 conference.
4. On July 5, 2017, Trans Union filed its answer.

5. On June 29, 2017, Plaintiff served Experian with requests for admission, requests for production of documents, and interrogatories.

6. On June 23, 2017, Plaintiff served Experian with a notice of deposition, setting the deposition of Experian's 30(b)(6) designee for August 8, 2017. Experian's witness is not available on August 8, 2017, but is available on September 20, 2017. Plaintiff's counsel has agreed to this date provided the parties stipulate to the extension of the motion to amend deadline until 50 days after the renoticed deposition date and Plaintiff's deposition occurs after Experian's deposition.

7. On July 13, 2017, the Discovery Plan and Scheduling Order was entered.

8. On July 18, 2017, the Stipulated Protective Order was entered.

9. On July 13, 2017, Trans Union and Experian served their initial disclosures.

10. On July 14, 2017, Plaintiff served his initial disclosures.

B. Specific Description of Discovery that Remains to be Completed

1. The deposition of Experian's 30(b)(6) witness, which Plaintiff has agreed to renote for September 20, 2017;

2. The deposition of Plaintiff, which Experian has agreed to renote for a date after Experian's rescheduled deposition;

3. Depositions of remaining parties and witnesses; and,

4. Any necessary additional written discovery.

C. Reasons Why the Remaining Discovery Was Not Completed

The parties aver, pursuant to LR 6-1, that good cause exists for the requested extension. At this juncture, the discovery close is December 18, 2017. This stipulation to extend the discovery deadlines is made well in advance of the applicable discovery deadlines and is made to accommodate the availability of Experian's 30(b)(6) designee on September 20, 2017, and Plaintiff's request, and the parties' agreement, to extend the motion to amend pleadings deadline such that the motion to amend pleadings deadline will now be approximately fifty (50) days after Experian's rescheduled deposition, or November 9, 2017. At this time, the parties do not request an extension of any other discovery deadlines, but only an extension of the motion to amend

1 deadline. The parties reserve the right to seek an extension of other deadlines in the future.

2 **D. Proposed Discovery Deadlines**

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<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	December 18, 2017	Same
Deadline to Amend Pleadings	September 19, 2017	November 9, 2017
Deadline to Disclose Initial Experts	October 19, 2017	Same
Deadline to Disclose Rebuttal Experts	November 20, 2017	Same

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Dispositive Motions	January 18, 2018	Same
Pre-Trial Order	February 19, 2018	Same

Dated: August 3, 2017

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KNEPPER & CLARK, LLC

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Attorneys for Defendant Trans Union LLC

ORDER

IT IS SO ORDERED.

Dated: August 7, 2017


 UNITED STATES MAGISTRATE JUDGE